



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7  
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Zaffar Eusuff  
California Department of Water Resources  
Division of Integrated Regional Water Management  
Financial Assistance Branch  
Post Office Box 942836  
Sacramento, CA 94236

Sent via email: [Muzaffar.Eusuff@water.ca.gov](mailto:Muzaffar.Eusuff@water.ca.gov)

Subject: ***DERWA Phase 3 Recycled Water Expansion Project – 2014 Drought Grant Solicitation Draft Funding Recommendation***

Dear Mr. Eusuff:

The above subject project is part of the Association of Bay Area Governments' application for the San Francisco Bay Area for \$4,000,000 to expand recycled water to the San Ramon Valley. Zone 7 Water Agency (Zone 7) is a public agency responsible for providing wholesale drinking water to approximately 220,000 people in the cities of Livermore, Pleasanton, Dublin and a portion of Dougherty Valley in the city of San Ramon. Zone 7 is also recognized as the area's existing groundwater sustainability agency (SB 1168, chapter 4; Water Code Section 107239(c)(1)(A)). As such, Zone 7 would like to confirm that the DSRSD/EBMUD Recycled Water Authority (DERWA) service area is within a California Statewide Groundwater Elevation Monitoring (CASGEM)-compliant area and that this project is qualified and funding should be reconsidered.

DERWA supplies recycled water for urban irrigation to supplement the surface water supplies that Zone 7 imports for the Valley. DERWA's Phase 3 Recycled Water Expansion Project will increase recycled water delivery capacity which will permanently reduce (by the same amount) the imported surface water demand for the region.


Development of recycled water supplies is extremely important for the sustainability of the groundwater supplies in the Livermore Valley Groundwater Basin as well. The groundwater basin is used for seasonal and drought storage for the region, and typically provides 15-25% of the regional drinking water supply. During droughts such as this year's, when State Water Project (SWP) allocations could be as low as 5%, the region is even more dependent on the limited water supplies stored in the groundwater basin. Having more recycled water available during drought periods will reduce the dependence on the groundwater supplies and make conservation goals easier to attain.

The DERWA project boundaries overlies two groundwater basins: the Livermore Valley Groundwater Basin (DWR Basin 2-10) and the San Ramon Valley Groundwater Basin (DWR Basin 2-7). The Livermore Valley Groundwater Basin is managed by the Zone 7 Water Agency (Zone 7) under an approved SB 1938-type groundwater management plan. A big part of local groundwater sustainability is facilitating the use of regional recycled water. As a co-permittee of the area's original "Master Water Recycling Permit," Order 93-159, Zone 7 developed a 2004 Salt Management Plan, to satisfy Provision D.1.c.ii of that permit. The Salt Management Plan was approved by the RWQCB in September 2004. Zone 7 continues to monitor and manage salt and nutrients in the area as part of its overall groundwater management plan and reports on these at least annually to the RWQCB, providing copies to DWR and posting on the Zone 7 website. Zone 7 is also the CASGEM Monitoring Entity for the Livermore Valley Basin and has been since the inception of CASGEM. The San Ramon Valley Groundwater Basin has a DWR priority ranking of "Very Low," hence it does not have a requirement for CASGEM participation.

In summary, the DERWA Phase 3 Recycled Water Expansion Project is important for the Livermore-Amador Valley region and for sustainable groundwater management of the Livermore Valley Groundwater Basin, a CASGEM compliant basin. Grant funding for this project is necessary to make it affordable for DERWA and to help the region cope with this and future droughts. The disqualification of the DERWA Phase 3 Recycled Water Expansion Project grant application due to its "CASGEM non-compliance" seems inappropriate. Please reconsider the information provided in this letter and in the associated letters from DERWA, DSRSD and EBMUD, before DWR finalizes its 2014 Drought Fund Awards. Zone 7 strongly supports this project and recommends that it be qualified to receive the requested grant funding.

Thank you for the opportunity to comment on this issue. If you have any questions or comments, please feel free to contact me at the number above (email [jduerig@zone7water.com](mailto:jduerig@zone7water.com)).

Sincerely,



G. F. Duerig  
General Manager

cc: James Bewley, DERWA  
Bert Michalczyk, DSRSD  
Alex Coate, EBMUD